

Remarks

This Application has been carefully reviewed in light of the Office Action mailed September 20, 2002. Applicants appreciate the Examiner's consideration of the Application. Applicants believe all pending claims are allowable over the prior art of record. Applicants have amended Claims 1-5 and 7 and added new Claims 8-36. Certain of these changes have not narrowed the claims. None of these changes is considered necessary for patentability. Applicants respectfully request reconsideration and allowance of all pending claims.

Drawings

Because the Examiner did not indicate an objection to the drawings filed with the Application, Applicants will defer the filing of formal drawings until one or more claims are indicated as allowable.

The Claims are Allowable Over *Fisher*

The Examiner rejects Claims 1-7 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,212,511 issued to Fisher et al. ("*Fisher*"). Applicants respectfully disagree.

Independent Claims 1 and 5 are Allowable

At a minimum, *Fisher* fails to disclose, teach, or suggest the following limitations specifically recited in independent Claim 1, as amended:

- an alert manager in communication with the router for *receiving a first selected subset of the event messages from the event router if the alert manager has registered with the event router to receive the first selected subset of the event messages*, the alert manager having registered with the event router by communicating registration information to the event router specifying that the first selected subset of the event messages is to be communicated to the alert manager upon receipt at the event router; and
- upon the alert manager receiving an event message within the first selected subset of event messages received from the event router, *the alert manager operable to evaluate all rules registered to act upon the event message and, for all rules*

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registered to act upon the event message that evaluate to True, the alert manager operable to send the associated notifications to one or more users.

Fisher merely discloses an event router that receives all event notifications and, for each event notification received by the event router, *the event router itself determines which users and entities have requested a copy of that event notification*, and then determines which of those users and entities has the right to receive those event notifications. (Column 14, Line 66 – Column 15, Line 11) According to *Fisher*, to determine access rights to event notifications, *the router itself* looks at a set of rules until a matching rule is found. (Column 15, Lines 11-16) For each requester of an event notification that has access rights to that event notification, *the event router itself generates a corresponding event notification message*, each of which is addressed to a single authorized user or entity. (Column 15, Lines 17-24) Thus, even assuming for the sake of argument that the event router in *Fisher* could be equated to Applicants' claimed event router, *Fisher* would still fail to disclose, teach, or suggest "an alert manager in communication with the router *for receiving a first selected subset of the event messages from the event router if the alert manager has registered with the event router to receive the first selected subset of the event messages*" and "upon the alert manager receiving an event message within the first selected subset of event messages received from the event router, *the alert manager operable to evaluate all rules registered to act upon the event message and, for all rules registered to act upon the event message that evaluate to True, the alert manager operable to send the associated notifications to one or more users*" as specifically recited in independent Claim 1 as amended.

For at least these reasons, *Fisher* fails to disclose, teach, or suggest the limitations specifically recited in independent Claim 1, whether *Fisher* is considered alone, in combination with any other reference of record, or in combination with knowledge generally available to one skilled in the art at the time of invention. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claim 1 and all claims that depend therefrom.

Independent Claim 5, as amended, recites certain limitations substantially similar to those recited in independent Claim 1, which Applicants have shown above to be allowable.

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In addition, independent Claim 5 recites certain other patentably distinguishing limitations. For at least the reasons discussed above with respect to independent Claim 1, *Fisher* fails to disclose, teach, or suggest the limitations specifically recited in independent Claim 5, whether *Fisher* is considered alone, in combination with any other reference of record, or in combination with knowledge generally available to one skilled in the art at the time of invention. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claim 5 and all claims that depend therefrom.

Independent Claim 3 is Allowable

At a minimum, *Fisher* fails to disclose, teach, or suggest the following limitations specifically recited in independent Claim 3, as amended:

- a plurality of event handlers in communication with the router, each event handler operable to receive one or more of the event messages received by the router, *each event handler communicating registration information to the router specifying which event messages should be communicated by the router to the event handler upon receipt of the event messages at the router*; and
- when the router receives an event message, the router is operable to evaluate the one or more rules associated with the event message, and *for rules that evaluate to True, forward the event message to the one or more event handlers registered to receive the event message.*

According to *Fisher*, all event notifications are delivered to the event router. (Column 14, Line 66 – Column 15, Line 4) *Fisher* discloses that as event notifications corresponding to an event log are generated, they are forwarded by the event router to a log server, which is registered with an event registry to receive *all* event notifications generated by the system. (Column 16, Lines 45-46; Column 17, Lines 59-61) The log server then forwards the event notifications to the event log's filter, where they are converted into SQL insert statements and sent to a Database Management System for storage. (Column 17, Lines 61-63) Thus, *Fisher* does not disclose, teach, or suggest that "when the router receives an event message, the router is operable to evaluate the one or more rules associated with the event message, and *for rules that evaluate to True, forward the event message to the one or more event handlers*

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registered to receive the event message." as specifically recited in independent Claim 3 as amended.

For at least these reasons, *Fisher* fails to disclose, teach, or suggest the limitations specifically recited in independent Claim 3, whether *Fisher* is considered alone, in combination with any other reference of record, or in combination with knowledge generally available to one skilled in the art at the time of invention. Accordingly, Applicants respectfully request reconsideration and allowance of Claim 3 and all claims that depend therefrom.

The Dependent Claims are Allowable

In addition to being dependent on Claims 1, 3, and 5, which Applicants have shown to be allowable, Claim 2 (which depends from independent Claim 1), Claim 4 (which depends from independent Claim 3), and Claims 6-7 (which depend from independent Claim 5) recite further patentable distinctions over the prior art of record. To avoid burdening the record and in view of the allowability of independent Claims 1, 3, and 5, Applicants have not specifically discussed in this Response the reasons each dependent claim is allowable. Applicants respectfully request reconsideration and allowance of dependent Claims 2, 4, and 6-7.

New Claims 8-32 Are Allowable

In addition to being dependent on allowable independent claims, new Claims 8-11 (which depend from independent Claim 1), new Claims 12-18 (which depend from independent Claim 3), and new Claims 19-25 (which depend from independent Claim 5) recite further patentable distinctions over the prior art of record. New Claims 26-35 are directed to software, recite substantially similar limitations to those recited in independent Claim 5 and those claims that depend from independent Claim 5 (including New Claims 19-25, which depend from independent Claim 5), and are allowable for at least the same reasons. New independent Claim 36 is expressed in "means-plus-function" format, recites substantially similar limitations to those recited in independent Claim 5, and is allowable for at least the same reasons. Applicants respectfully request consideration and allowance of New Claims 8-36.

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Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully requests full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants, at the Examiner's convenience at (214) 953-6812.

A check for \$456.00 is included to cover the cost of 16 new claims over twenty and 2 new independent claims over three. Although no other fees are believed due, the Commissioner is hereby authorized to charge any additional fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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